

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

**IN RE:
VERONICA R DESHAY**

Debtor

) **CASE NO: 18-42077**
) **Chapter 13**
)
) **Response Due: 04/06/2023**
) **Hearing: 04/13/2023 10:00 am**
) **Location: St. Louis, Room 7 South**

**NOTICE OF HEARING AND TRUSTEE'S MOTION TO DISMISS FOR LACK OF
FEASIBILITY OF THE CHAPTER 13 PLAN AND FOR FAILURE TO TURN OVER
TAX RETURNS**

PLEASE TAKE NOTICE: The Motion herein is scheduled for hearing at the date and time shown above.

WARNING: THIS MOTION SEEKS AN ORDER THAT MAY ADVERSELY AFFECT YOU. IF YOU OPPOSE THE MOTION, YOU SHOULD IMMEDIATELY CONTACT THE MOVING PARTY TO RESOLVE THE DISPUTE. IF YOU AND THE MOVING PARTY CANNOT AGREE, YOU MUST FILE A RESPONSE AND SEND A COPY TO THE MOVING PARTY. YOU MUST FILE AND SERVE YOUR RESPONSE BY April 06, 2023. YOUR RESPONSE MUST STATE WHY THE MOTION SHOULD NOT BE GRANTED. IF YOU DO NOT FILE A TIMELY RESPONSE, THE RELIEF MAY BE GRANTED WITHOUT FURTHER NOTICE TO YOU. IF YOU OPPOSE THE MOTION AND HAVE NOT REACHED AN AGREEMENT, YOU MUST ATTEND THE HEARING. THE DATE IS SET OUT ABOVE. UNLESS THE PARTIES AGREE OTHERWISE, THE COURT MAY CONSIDER EVIDENCE AT THE HEARING AND MAY DECIDE THE MOTION AT THE HEARING.

REPRESENTED PARTIES SHOULD ACT THROUGH THEIR ATTORNEYS.

COMES NOW Diana S. Daugherty, Standing Chapter 13 Trustee in Bankruptcy, and for her Motion to Dismiss states as follows:

1. Debtor's plan will not pay secured creditors the fair market value of their collateral during the proposed plan term. 1325 (a)(5)(B)(ii)
2. Debtor's plan will not pay priority creditors in full.
3. Debtor's plan will not have enough funds to pay attorney fees.
4. The Trustee has not received 2019, 2020 & 2021 Federal & State income tax returns.

WHEREFORE the Trustee prays the Court enter its order dismissing this Chapter 13 case.

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**NOTICE OF HEARING AND TRUSTEE'S MOTION TO
DISMISS FOR LACK OF FEASIBILITY OF THE CHAPTER**

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Dated: March 02, 2023

/s/ Diana S. Daugherty

MTDFEAS--LS

Diana S. Daugherty
Standing Chapter 13 Trustee
P.O. Box 430908
St. Louis, MO 63143
(314) 781-8100 Fax: (314) 781-8881
trust33@ch13stl.com

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing document was filed electronically on March 02, 2023, with the United States Bankruptcy Court, and has been served on the parties in interest via e-mail by the Court's CM/ECF System as listed on the Court's Electronic Mail Notice List.

I certify that a true and correct copy of the foregoing document was filed electronically with the United States Bankruptcy Court, and has been served by Regular United States Mail Service, first class, postage fully pre-paid, addressed to those parties listed on the Court's Manual Notice List and listed below on March 02, 2023.

VERONICA R DESHAY
715 HAZEL VALLEY DRIVE
HAZELWOOD, MO 63042

/s/ Diana S. Daugherty

Diana S. Daugherty, Chapter 13 Trustee

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CREDITOR INFORMATION

CREDITOR	CLAIM AMOUNT	PRINCIPAL OWED
HEAGLER LAW FIRM	\$2,000.00	\$0.00
VERONICA R DESHAY	\$0.00	\$0.00
HEAGLER LAW FIRM	\$2,000.00	\$2,000.00
INTERNAL REVENUE SERV	\$1,117.62	\$1,117.62
MO DEPT OF REVENUE	\$235.70	\$235.70
MO DEPT OF REVENUE	\$1,595.76	\$1,595.76
QUANTUM3 GROUP LLC	\$75.00	\$75.00
QUANTUM3 GROUP LLC	\$75.00	\$75.00
INTERNAL REVENUE SERV	\$303.81	\$303.81
MO DEPT OF REVENUE	\$56.75	\$56.75
MO DEPT OF REVENUE	\$1,522.28	\$1,522.28
C&F FINANCE CO	\$12,312.81	\$12,312.81
C&F FINANCE CO	\$12,125.00	\$596.75